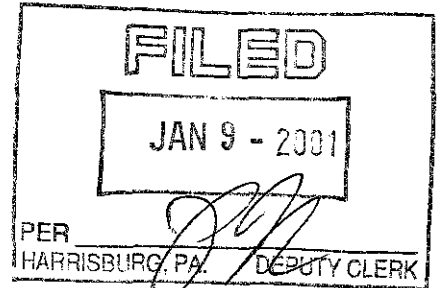


IN THE UNITED STATES DISTRICT COURT
 FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
 JOHN RICHARD JAGS
 Plaintiff

CP#1 No. 1-00-00-1
 U.S. District Judge Ramey
 Magistrate Judge Smyse

vs.
 DR. ROBERT CLARK,
 MARTIN L. DRAGONICH,
 JOHN A. PALAKOVICH,
 ROBERT N. NOVOTNEY,
 MICHAEL J. KAZOR, and
 JOHN ANDRADES



MOTION FOR APPOINTMENT OF COUNSEL

COMES now the Plaintiff & his Counsel in the above
 entitled Civil Action, John Richard Jags a Layman Unlettered in the Arts &
 of the Laws & Legal Procedures with the United States, pursuant to
 U.S.C. § 1915 b(1) & now files his Motion for Appointment of Counsel
 & who, avers, deposes & states:

1. The Plaintiff is unable to afford Counsel.
2. The Issues involved in this case are complex but meritorious.
3. The Plaintiff as a Special Unit Inmate, has extremely limited
 access to the SMU inmate Law Library & the Legal Materials contained therein
 are extremely limited.

4. The Plaintiff has a limited knowledge of the law, especially pertaining
 a showing of imminent danger of serious physical injury.

5. Plaintiff requests that this Court request Attorney Andrew R. Love,
 Executive Director of the Pennsylvania Institutional Law Dept to be
 this Plaintiff as Mr. Love is familiar with him & this case.

Dated: 31st December 2000

RESPECTFULLY SUBMITTED
 John Richard Jags
 (S) MR. John Richard Jags
 #BQ-3219
 175 Progress Drive
 Wyncennesburg, PA 15370